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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Illinois Valley Cellular RSA 2-I Partnership dba Illinois Valley Cellular ("Illinois Valley"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending June 30, 2002, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Illinois Valley now files this instant report with the Commission.

I. Carrier Background

Illinois Valley provides analog and TDMA digital CMRS wireless service in the Illinois 2-Bureau RSA.³ As detailed below, and as has been acknowledged by the Commission in its grant of Illinois Valley's request for waiver of Commission Rule 20.18(c) until December 31, 2003, compliance with the Commission's June 30, 2002 deadline was impractical.⁴ By way of background, as the Commission is well aware, during the past twenty-four (24) months, the two

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN583 (CMA395B1).

⁴ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, DA 02-1540 (rel. June 28, 2002). ("*Order*"). (Granting Illinois Valley's request for waiver until December 31, 2003.)

major carriers utilizing TDMA technology (Cingular Wireless (“Cingular”) and AT&T) announced their plans to migrate their TDMA deployments to a totally different, non-compatible digital technology. At the end of December, US Cellular reported having decided to migrate its remaining TDMA markets to CDMA digital technology. The Cingular/AT&T decisions led to the announcements by virtually all major cellular infrastructure providers, including Nortel Networks, Inc. (“Nortel”) (Illinois Valley’s infrastructure provider), of plans to cease development of new features and functionalities for their TDMA infrastructure equipment. During the Fourth Quarter of 2001, Illinois Valley filed a request for waiver of the Commission’s December 31, 2001 and June 30, 2002 deadlines, until December 31, 2003.⁵ In support of its request for waiver, Illinois Valley met with the Commission.⁶ Further, Illinois Valley filed a supplement to its waiver request to answer questions asked by Commission staff in the aforementioned meeting.⁷ As stated above, the Commission recently granted Illinois Valley’s request for waiver.

II. Access to 911 Through TTY Devices

A. Development Activities

While Commission action on its waiver request was pending, and through June 30, 2002, Illinois Valley did not proceed with development activities, except to replace its switch processors and obtain the necessary switch hardware upgrades to enable it to migrate to MTX10, the minimum software load necessary to deploy the TDMA feature-specific TTY compatibility software, and other FCC-mandated capabilities. Based on cost constraints, and the necessity of migrating to a different technology, Illinois Valley did not deploy the TDMA feature-specific TTY compatibility software.

B. Testing and Deployment Activities

While Commission action on its waiver request was pending, and through June 30, 2002, Illinois Valley did not proceed with any market-specific testing. However, even if its network

⁵Joint Petition of Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership, and Illinois Valley Cellular RSA 2-III Partnership for Limited Waiver of Section 20.18(c) of the Commission’s Rules and the Deadlines Established in the *Fourth Report and Order*, CC Docket No. 94-102, FCC 00-436 (December 21, 2001).

⁶ Letter from Kurtis & Associates, P.C. to William Caton, Acting Secretary of the Federal Communications Commission, Notice of *Ex Parte* Communication, CC Docket No. 94-102, DA 02-640 (disclosure of meeting held on March 25, 2002 with representatives of the Wireless Telecommunications Bureau and the Office of Engineering and Technology) (March 25, 2002.)

⁷ Letter from Letter from Kurtis & Associates, P.C. to William Caton, Acting Secretary of the Federal Communications Commission, Information Sheet, CC Docket No. 94-102, DA 02-640, FCC 00-436 (April 8, 2002).

was TTY-compatible, the lack of available TTY compatible TDMA handsets to Illinois Valley would have precluded the initiation of testing on the Illinois Valley network.

Illinois Valley has made its decision on an alternate digital technology to deploy and has issued purchase orders for all hardware and software needed to overlay its existing TDMA network with a new digital format that has been ordered in a full, TTY-compatible configuration. Illinois Valley hopes to have this new system operational within the next six (6) months.

III. Conclusion

Illinois Valley has been granted a waiver of the Commission's June 30, 2002 deadline for compliance with 47 C.F.R. 20.18(c), until December 31, 2003. Because of the announced abandonment of TDMA technology, Illinois Valley is preparing to migrate its network to an alternate digital technology that will not only meet the TTY-compatibility requirements but will also be capable of meeting the other FCC-mandated capabilities. When Illinois Valley makes its migration to a new digital technology, Illinois Valley will deploy that technology in a mode fully compatible with TTY devices. As required, under the Commission's recent *Order*, Illinois Valley will provide the Commission with quarterly updates on the status of development and deployment.

Respectfully Submitted,

Illinois Valley Cellular RSA2-I Partnership dba
Illinois Valley Cellular

Dated: July 15, 2002

/S/ Anna E. Ward

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CERTIFICATE OF SERVICE

I, LaWanda Y. Tyson, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of July 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/S/ LaWanda Y. Tyson
LaWanda Y. Tyson